




PATRICK+COUGHLIN

APPLICATION GRANTED
SO ORDERED

+ Via ECF +

July 11, 2025

7/14/25 
John G. Koeltl, U.S.D.J.

Honorable John G. Koeltl, U.S.D.J.
United States District Court, Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: ***Okla. Firefighters Pension and Ret. Sys. v. Deutsche Bank Aktiengesellschaft, et al.,***
No. 1:23-cv-05095

Dear Judge Koeltl:

Pursuant to Rule VII.A.2 of the Court's Individual Practices, Plaintiff Oklahoma Firefighters Pension and Retirement System ("OKFPRS") moves for leave to file the First Amended Consolidated Class Action Complaint ("FAC") under seal. Plaintiff has filed a redacted version of this document on the public docket.

The Court previously approved sealing of this document in granting the application of Settling Defendants¹ in connection with OKFPRS's motion for leave to amend the complaint. See ECF No. 144; *see also* ECF No. 141-1. Now that leave has been granted, OKFPRS is requesting sealing for the same reasons previously endorsed by the Court, namely that the FAC relies on materials designated "Confidential" by Settling Defendants pursuant to the terms of the March 25, 2025 Stipulation and Protective Order Governing the Confidentiality of Cooperation Materials. ECF No. 128. Moreover, the scope of the redactions is identical to what the Court previously approved. See ECF No. 138-1.

We are available to discuss any questions the Court may have.

Respectfully submitted,

SCOTT+SCOTT ATTORNEYS AT LAW LLP

/s/ Patrick Coughlin
PATRICK COUGHLIN
FATIMA BRIZUELA
PATRICK J. RODRIGUEZ
DANIEL J. BROCKWELL (admitted *pro hac vice*)

¹ "Settling Defendants" are Defendants Citigroup Global Markets Limited, Citigroup Global Markets Inc., RBC Europe Limited, RBC Capital Markets LLC, HSBC Bank plc, HSBC Securities (USA) Inc., Morgan Stanley & Co International Plc and Morgan Stanley & Co. LLC.

The Hon. John G. Koeltl, U.S.D.J.

July 11, 2025

Page 2

JONATHAN SMALL WOOD (admitted *pro hac vice*)
600 W. Broadway, Suite 3300
San Diego, CA 92101
Telephone: 619-233-4565
Facsimile: 619-233-0508
pcoughlin@scott-scott.com
fbrizuela@scott-scott.com
prodriguez@scott-scott.com
dbrockwell@scott-scott.com
jsmallwood@scott-scott.com

SCOTT+SCOTT ATTORNEYS AT LAW LLP

KRISTEN M. ANDERSON
DONALD A. BROGGI
MICHELLE E. CONSTON
The Helmsley Building
230 Park Ave., 24th Floor
New York, NY 10169
Telephone: 212-223-6444
Facsimile: 212-223-6334
kanderson@scott-scott.com
dbroggi@scott-scott.com
mconston@scott-scott.com

SCOTT+SCOTT ATTORNEYS AT LAW LLP

DAVID R. SCOTT
AMANDA LAWRENCE
156 South Main Street
P.O. Box 192
Colchester, CT 06415
Telephone: 860-537-5537
Facsimile: 860-537-4432
david.scott@scott-scott.com
alawrence@scott-scott.com

*Counsel for Plaintiff Oklahoma Firefighters
Pension and Retirement System, and Proposed
Class Counsel*

cc: All Parties of Record via ECF